

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

Chanel, Inc.,

NO. C 09-05593 JW

Plaintiff,

**JUDGMENT AND PERMANENT
INJUNCTION**

v.

Zhou Guodong, et al.,

Defendants.

Pursuant to the Court's May 7, 2010 Order Granting Plaintiff's Motion for Default Judgment and Permanent Injunction, judgment is entered in favor of Plaintiff Chanel Inc., against Defendants Zhou Guodong and Zhang Nan.

Judgment is entered against Defendants for statutory damages in the sum of \$315,000 pursuant to 15 U.S.C. § 1117(c), \$1,250,000 pursuant to 15 U.S.C. § 1117(d), and costs in the sum of \$650. The Court enjoins Zhou Guodong and Zhang Nan, and their respective officers, agents, servants, employees and attorneys, and all persons in active concert and participation with them from:

(a) manufacturing or causing to be manufactured, importing, advertising, or promoting, distributing, selling or offering to sell counterfeit and infringing goods using the Chanel Marks;

(b) using the Chanel Marks in connection with the sale of any unauthorized goods;

(c) using any logo, and/or layout which may be calculated to falsely advertise the services or products of Zhou Guodong, Zhang Nan, brandbags4u.com, brandbagsgift.com,

brandbagstime.com, brandhandbagsale.com, chanelcollections.com, chanelgiftshop.com,
 chanelgiftstore.com, chanel-handbags.com, chanelhandbagsdiscount.com,
 chanelhandbagswallets.com, chanelhandbagtoday.com, chanelloisvuitton.com,
 chanelnewcollections.com, chanelshandbags.com, chaneltoday.com,
 discountchanelpurses.com, eloongstore.com, getchanelhandbags.com, linksjewelryshop.com,
 linksjewelrystore.com, linksjewelrytime.com, linksjewelrytoday.com, luxurybags4u.com,
 luxurybagsales.com, luxurychanelbags.com, luxurychanelhandbags.com, mybagstime.com,
 mychanelcollections.com, mychanelestore.com, mychanelshop.com, mychanelstore.com,
 thebags sell.com, thebuyidea.com, topchanelhandbags.com, vividchanelhandbags.com,
 yeahchanelcollections.com, yeahchanelshop.com, yeschanelgifts.com,
 yeschanelhandbags.com, yeswatchshop.com, and/or any other website or business, as being
 sponsored by, authorized by, endorsed by, or in any way associated with Chanel;
 (d) falsely representing themselves as being connected with Chanel, through sponsorship or
 association;
 (e) engaging in any act which is likely to falsely cause members of the trade and/or of the
 purchasing public to believe any goods or services of Zhou Guodong, Zhang Nan,
 brandbags4u.com, brandbagsgift.com, brandbagstime.com, brandhandbagsale.com,
 chanelcollections.com, chanelgiftshop.com, chanelgiftstore.com, chanel-handbags.com,
 chanelhandbagsdiscount.com, chanelhandbagswallets.com, chanelhandbagtoday.com,
 chanelloisvuitton.com, chanelnewcollections.com, chanelshandbags.com, chaneltoday.com,
 discountchanelpurses.com, eloongstore.com, getchanelhandbags.com, linksjewelryshop.com,
 linksjewelrystore.com, linksjewelrytime.com, linksjewelrytoday.com, luxurybags4u.com,
 luxurybagsales.com, luxurychanelbags.com, luxurychanelhandbags.com, mybagstime.com,
 mychanelcollections.com, mychanelestore.com, mychanelshop.com, mychanelstore.com,
 thebags sell.com, thebuyidea.com, topchanelhandbags.com, vividchanelhandbags.com,
 yeahchanelcollections.com, yeahchanelshop.com, yeschanelgifts.com,

yeschanelhandbags.com, yeswatchshop.com, and/or any other website or business, are in any way endorsed by, approved by, and/or associated with Chanel;

(f) using any reproduction, counterfeit, copy, or colorable imitation of the Chanel Marks in connection with the publicity, promotion, sale, or advertising of any goods sold by Zhou Guodong, Zhang Nan, brandbags4u.com, brandbagsgift.com, brandbagstime.com, brandhandbagsale.com, chanelcollections.com, chanelgiftshop.com, chanelgiftstore.com, chanelhandbags.com, chanelhandbagsdiscount.com, chanelhandbagswallets.com, chanelhandbagtoday.com, chanellouisvuitton.com, chanelnewcollections.com, chanelshandbags.com, chaneltoday.com, discountchanelpurses.com, elongstore.com, getchanelhandbags.com, linksjewelryshop.com, linksjewelrystore.com, linksjewelrytime.com, linksjewelrytoday.com, luxurybags4u.com, luxurybagsales.com, luxurychanelbags.com, luxurychanelhandbags.com, mybagstime.com, mychanelcollections.com, mychanelestore.com, mychanelshop.com, mychanelstore.com, thebags sell.com, thebuyidea.com, topchanelhandbags.com, vividchanelhandbags.com, yeahchanelcollections.com, yeahchanelshop.com, yeschanelgifts.com, yeschanelhandbags.com, yeswatchshop.com, and/or any other website or business, including, without limitation, handbags, wallets, watches, rings, bracelets, earrings, and necklaces;

(g) affixing, applying, annexing or using in connection with the sale of any goods, a false description or representation, including words or other symbols tending to falsely describe or represent goods by Zhou Guodong, Zhang Nan, brandbags4u.com, brandbagsgift.com, brandbagstime.com, brandhandbagsale.com, chanelcollections.com, chanelgiftshop.com, chanelgiftstore.com, chanel-handbags.com, chanelhandbagsdiscount.com, chanelhandbagswallets.com, chanelhandbagtoday.com, chanellouisvuitton.com, chanelnewcollections.com, chanelshandbags.com, chaneltoday.com, discountchanelpurses.com, elongstore.com, getchanelhandbags.com, linksjewelryshop.com, linksjewelrystore.com, linksjewelrytime.com, linksjewelrytoday.com, luxurybags4u.com, luxurybagsales.com, luxurychanelbags.com, luxurychanelhandbags.com, mybagstime.com,

1 mychanelcollections.com, mychanelestore.com, mychanelshop.com, mychanelstore.com,
2 thebags sell.com, thebuyidea.com, topchanelhandbags.com, vividchanelhandbags.com,
3 yeahchanelcollections.com, yeahchanelshop.com, yeschanelgifts.com,
4 yeschanelhandbags.com, yeswatchshop.com, and/or any other website or business, as being
5 those of Chanel or in any way endorsed by Chanel;
6 (h) offering such goods in commerce;
7 (i) otherwise unfairly competing with Chanel;
8 (j) secreting, destroying, altering, removing, or otherwise dealing with the unauthorized
9 products or any books or records which contain any information relating to the importing,
10 manufacturing, producing, distributing, circulating, selling, marketing, offering for sale,
11 advertising, promoting, renting or displaying of all unauthorized products which infringe the
12 Chanel; and
13 (k) effecting assignments or transfers, forming new entities or associations or utilizing any
14 other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth
15 above.

16 Upon Plaintiff's request, Defendants, those acting in concert with them, and those with
17 notice of the injunction, including any Internet search engines, Web hosts, domain-name registrars
18 and domain-name registries that are provided with notice of the injunction, shall be and are hereby
19 restrained and enjoined from facilitating access to any or all websites through which Defendants
20 engage in the sale of counterfeit and infringing goods using the Chanel Marks.

21 In order to give practical effect to the permanent injunction, the following Subject Domain
22 Names are ordered to be immediately transferred by Defendants, their assignees and successors in
23 interest or title, and the Registrar of the Subject Domain Names to Plaintiff's control:

24 brandbags4u.com, brandbagsgift.com, brandbagstime.com, brandhandbagsale.com,
25 chanelcollections.com, chanelgiftshop.com, chanelgiftstore.com, chanel-handbags.com,
26 chanelhandbagsdiscount.com, chanelhandbagswallets.com, chanelhandbagtoday.com,
27 chanellouisvuitton.com, chanelnewcollections.com, chanelshandbags.com, chaneltoday.com,
28


1 discountchanelpurses.com, eloongstore.com, getchanelhandbags.com, linksjewelryshop.com,
2 linksjewelrystore.com, linksjewelrytime.com, linksjewelrytoday.com, luxurybags4u.com,
3 luxurybagsales.com, luxurychanelbags.com, luxurychanelhandbags.com, mybagstime.com,
4 mychanelcollections.com, mychanelestore.com, mychanelshop.com, mychanelstore.com,
5 thebags sell.com, thebuyidea.com, topchanelhandbags.com, vividchanelhandbags.com,
6 yeahchanelcollections.com, yeahchanelshop.com, yeschanelgifts.com, yeschanelhandbags.com, and
7 yeswatchshop.com. To the extent the current Registrar does not facilitate the transfer of the domain
8 name to Plaintiff's control within ten (10) days of receipt of this judgment, the United States based
9 Registry shall, within thirty (30) days, transfer the domain names to a United States based Registrar
10 of Plaintiff's choosing, and that Registrar shall transfer the domain name to Plaintiffs;

11 Upon Plaintiff's request, the top level domain (TLD) Registries for the Subject Domain
12 Names, within thirty (30) days of receipt of this Order, shall place the Subject Domain Names on
13 Registry Hold status, thus removing them from the TLD zone files maintained by the Registry which
14 link the Subject Domain Name to the IP address where the associated website is hosted.

15 IT IS SO ORDERED.

16 The Clerk shall close this file.

17
18 Dated: May 7, 2010



JAMES WARE
United States District Judge

1 **THIS IS TO CERTIFY THAT COPIES OF THIS ORDER HAVE BEEN DELIVERED TO:**

2 Anne Elizabeth Kearns akearns@kksrr.com
3 Kenneth E. Keller kkeller@kksrr.com

4 **Dated: May 7, 2010**

Richard W. Wieking, Clerk

5
6 **By: /s/ JW Chambers**

Elizabeth Garcia
Courtroom Deputy